

Deficiencies and Corrective Actions **For Marin County**

1. **Deficiency:** The CUPA's Unified Inspection and Enforcement Plan has not been updated as necessary.

CUPA Corrective Action: The Marin CUPA has developed an updated CUPA Inspection and Enforcement Plan in consultation with County Counsel and the District Attorney. The plan includes all required elements, including the incorporation of the AEO process and Universal Waste handlers. The Marin CUPA will finalize this plan, including submittal to Cal EPA and Marin County Code amendment, by the April 1, 2007 requested completion date.

Cal/EPA Response: The CUPA's corrective action for this deficiency is sufficient. Cal/EPA considers this deficiency corrected; no further updates are necessary.

2. **Deficiency:** Although the permit includes the method of monitoring the tanks, it does not list the monitoring method(s) of the piping.

CUPA Corrective Action: The Underground Storage Tank (UST) permit has been modified to include monitoring method(s) utilized in the UST's piping. The revised UST facility permits will be issued with Marin CUPA's calendar year 2007 (January 01 – December 31, 2007) invoicing/permitting cycle.

Cal/EPA Response: The CUPA's corrective action for this deficiency is acceptable. Cal/EPA considers this deficiency corrected; no further updates are necessary.

3. **Deficiency:** Some of the UST forms viewed in the files were not the current version, and therefore not up-to-date with the reporting requirements.

CUPA Corrective Action: Following September's Audit, Marin CUPA staff reviewed forms for All CUPA regulated programs and made updates as needed. As the CUPA inspectors perform the annual monitoring certification inspections, the inspectors will have the UST forms A & B updated by the UST Owner/Operator. All forms in the UST files will be reviewed and updated by the completion of the annual UST monitoring certification inspection cycle (estimated October 2007).

Cal/EPA Response: The CUPA's corrective action for this deficiency is acceptable. Cal/EPA considers this deficiency corrected; no further updates are necessary.

- 4. Deficiency:** In several reviewed files, the Chief Financial Officer (CFO) letters were not current.

CUPA Corrective Action: At the time of each permitted facility's next inspection. As the CUPA inspectors review The CUPA inspectors are reviewing all CFO letters and other mechanisms and requiring updates, if applicable. This review and updating process will be conducted on an annual basis.

Cal/EPA Response: The CUPA's corrective action for this deficiency is acceptable. Cal/EPA considers this deficiency corrected; no further updates are necessary.

- 5. Deficiency:** The installation/modification application does not address the new construction requirements. Current tank installations require VPH monitoring, ELD testing, and secondary containment of sumps depending on piping construction, etc.

CUPA Corrective Action: The Marin CUPA updated their installation/modification application to include discussion of the new standards and requirements. Included in the new standard are the following: VPH monitoring, ELD testing, and secondary containment of sumps depending on piping construction, etc. These changes were completed on September 29, 2006.

Cal/EPA Response: The CUPA's corrective action for this deficiency is acceptable. Cal/EPA considers this deficiency corrected; no further updates are necessary.

- 6. Deficiency:** The CUPA's area plans have not been reviewed and revised in the past three years; City of San Rafael May 2001 & Marin County April 2003.

CUPA Corrective Action: In October, the Marin CUPA was awarded a OES grant for the purposes on updating Marin's Hazardous Material Area Plan. CUPA staff are currently in the process of drafting a Request For Proposal (RFP) for revision and updating the Area Plan. Marin intends to distribute the RFP early in January and select a consultant by March 2007.

Cal/EPA Response: Continue with the efforts being made to correct this deficiency. In the next deficiency status report, the CUPA shall report on the status of their actions to update Marin's Hazardous Material Area Plan.

- 7. Deficiency:** The CUPA does not have a CalARP dispute resolution procedure.

CUPA Corrective Action: The Marin CUPA has developed a CalARP dispute resolution procedure that addresses all of the elements of Title 19, 2780.1. The CalARP dispute resolution procedure was completed and added to Section 10 of Marin CUPA's Standard Operating Procedures (SOP) for the Cal ARP Program. A copy of the Cal ARP SOP is attached to this update.

Cal/EPA Response: The CUPA's response to this deficiency is adequate. Cal/EPA considers this deficiency corrected; no further updates are necessary.

- 8. Deficiency:** The CUPA is not ensuring that all businesses include in their business plans emergency plan/procedures for: identification of areas of the facility and mechanical or other systems that require immediate inspection or isolation because of their vulnerability to earthquake related ground motion.

CUPA Corrective Action: During the evaluation, the CUPA drafted language to include identification of areas of the facility and mechanical or other systems that require immediate inspection or isolation because of their vulnerability to earthquake in our business plan boiler plate package provided to business to utilize for developing business plans. A copy of the revised boiler plate package is included with this update as an attachment. Additionally, the CUPA has begun ensuring that all businesses address such areas and mechanical or other systems in their business plans during the next inspection of the businesses.

Cal/EPA Response: The CUPA's response to this deficiency is adequate. Cal/EPA considers this deficiency corrected; no further updates are necessary.

- 9. Deficiency:** During the oversight inspection, CUPA staff was not aware of Large Quantity Generator standards such as tank integrity and secondary containment assessment requirements, biennial reporting, and Source Reduction requirements. During the file review, it was observed that one facility (Biosearch Tech) was a LQG and the Source Reduction requirement was mistakenly identified as non applicable.

CUPA Corrective Action: In October, Marin CUPA staff attended a three day training on the requirements for LQG's, SQG's tiered permitting and recycling standards. Additionally, the Marin CUPA has updated their inspection checklist to include the added requirements for LQGs.

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HAZARDOUS MATERIALS BUSINESS PLAN

Authority Cited: Ch. 6.95 HSC; Title 19, Div. 2, CCR; Title 22, Div. 4.5, CCR

County of Marin, Department of Public Works, Waste Management Division-CUPA

65 Mitchell Blvd., Suite 200B, San Rafael, CA 94903

P.O. Box 4186, San Rafael, CA 94913-4186

Phone (415) 499-6647

Fax (415) 446-7373

All facilities in Marin County that handle or store hazardous materials (*defined as either virgin or waste materials*) in a quantity required by State law and regulation are to report such use or storage to the County of Marin Certified Unified Programs Agency (CUPA) before the operation of their business. The amount of detail required to be reported, depends on whether or not a facility is subject to State Hazardous Materials Business Plan (HMBP) reporting requirements. See the required reporting amounts under "Who must complete an HMBP?"

The attached Hazardous Materials Business Plan is the preferred format for HMBP reporting. If you wish to use forms other than those provided as samples, please contact the Marin County CUPA. Depending upon the nature of storage/handling of hazardous materials at the facility, additional information may be required to be submitted as Appendices to the HMBP. Examples of such Appendices could include:

- For underground storage tanks, Unified Program Consolidated Forms (UPCF) UST - Facility and UST - Tank
- California Accidental Release Prevention (CalARP) Program Registration Form;
- Aboveground Storage Tank Spill Prevention Control and Countermeasure Plan

What is a Hazardous Materials Business Plan?

A HMBP is a document containing detailed information on the storage of hazardous materials at a facility. Chapter 6.95 of the California Health & Safety Code (HSC) and Title 19, Division 2, of the California Code of Regulations (CCR) require that facilities which use or store such materials at or above reporting thresholds (*see below*) submit this information.

What is the Purpose of the Hazardous Materials Business Plan?

The intent of the Business Plan is to satisfy federal and state Community Right-To-Know laws and provide detailed information for use by emergency responders. All persons at the facility who are qualified to serve as emergency coordinators must be thoroughly familiar with the contents and use of the HMBP, with the operations and activities of the facility, and with the locations of all hazardous materials records maintained by the facility.

This HMBP has been developed to assist you in complying with the State requirements and to provide the fire department adequate information about the type, quantity of – and management practices regarding – hazardous materials that are stored at your facility. Along with applicable modules and appendices, it is intended to additionally satisfy some or all of the reporting requirements for the following programs: CalARP Program Registration; Underground Storage Tank; Hazardous Waste Generator; Hazardous Waste Tiered Permitting; and Aboveground Storage Tank Spill Prevention Control and Countermeasure Plan.

Who must complete a Hazardous Materials Business Plan?

The owner of a facility must complete a HMBP and submit a copy to the Marin County CUPA for each site that handles any individual hazardous material or mixture containing a hazardous material which has a quantity at any time during the reporting year equal to or greater than:

1. 500 pounds or more of any solid hazardous material. [HSC §25503.5(a)]
2. For liquid hazardous materials:
 - a. More than 55 gallons of any type or 275 gallons aggregate quantity on site for lubricating oils as defined by HSC §25503.5(b)(2)(B): [HSC §25503.5(b)(2)(A)]
 - b. 55 gallons or more of any other liquid, including waste oil. [HSC §25503.5(a)]
3. For hazardous material gases:
 - a. More than 1,000 cubic feet (at standard temperature and pressure) of Oxygen, Nitrogen, or Nitrous Oxide stored/handled at a physician, dentist, podiatrist, veterinarian, or pharmacist's place of business. [HSC §25503.5(b)(1)]
 - b. More than 300 gallons of Propane used for the sole purpose of heating the employee working areas within the facility. [HSC §25503.5(b)]
 - c. 200 cubic feet or more of any other gas. [HSC §25503.5(a)]
4. Amounts of radioactive materials requiring an emergency plan under Parts 30, 40, or 70 of Title 10 Code of Federal Regulations (CFR) or applicable quantities specified in items 1, 2, or 3, above, whichever amount is smaller. [HSC §25503.5(a)]
5. Applicable federal threshold planning quantities for extremely hazardous substances listed in 40 CFR Part 355, Appendix A.

Hazardous Materials Business Plan Information Sheet (continued)

Note: Retail (Consumer) Products packaged for direct distribution to, and use by, the general public are exempt from HMBP requirements except where the local agency determines otherwise pursuant to HSC §25503.5(c)(1).

What information is required to be submitted with the Hazardous Materials Business Plan?

The HMBP must contain the following elements:

- Business Activities (Form and instructions attached)
- Business Owner/Operator Identification (Form and instructions attached)
- Hazardous Materials Inventory Statement (Form and instructions attached)-One page per chemical
- Facility Map(s) (Sample form and instructions attached)
- Emergency Response/Contingency Plan (Sample forms and instructions attached)
- Employee Training Plan (Sample form and instructions attached)
- Recordkeeping (Sample form and instructions attached)

How often do I have to update or recertify my Hazardous Materials Business Plan?

Within 30 days of the occurrence of any of the following events, the HMBP shall be revised and the revisions submitted to the Marin County CUPA: (1) There is a 100% or more increase in the quantity of a previously disclosed material; (2) The facility begins handling a previously undisclosed material at or above HMBP reporting thresholds; (3) The facility changes address; (4) Ownership of the facility changes; or (5) There is a change of business name. [H&SC §25510]

Additionally, if the Marin County CUPA determines that the HMBP is deficient in any way, the plan shall be revised and the revisions submitted to the Marin County CUPA within 30 days of the notice to submit a corrected plan. [HSC §25505(a)(2)]

Without regard to the above events, the owner, operator, or designated representative of the facility must complete and submit to the Marin County CUPA a Hazardous Materials Business Plan Certification Form [or a copy of your current hazardous materials inventory and an updated certification signature and date at the bottom of the Business Owner/Operator Identification page (i.e. page 5 of this packet)] annually. [HSC §25503.3(c)]

Facilities subject to Federal Emergency Planning and Community Right-to-Know Act (EPCRA) reporting requirements must submit the following to satisfy annual inventory certification requirements: a UPCF Business Activities page; UPCF Business Owner/Operator Identification page with current signature and date; and Hazardous Materials Inventory Statement page(s) with an original signature, photocopy of an original signature, or signature stamp on each page which lists an Extremely Hazardous Substance (EHS) handled at or above its Federal Threshold Planning Quantity (TPQ) or 500 pounds, whichever is less. [19 CCR §2729.5(c)]

The entire HMBP must be reviewed every three years to determine whether revision is needed. The facility owner, operator, or designated representative must certify that the review was performed and any needed changes were made. This certification is accomplished by completing and submitting to the local agency a Hazardous Materials Business Plan Certification Form if no changes have been made to the HMBP, or a copy of the complete HMBP with an updated certification signature and date at the bottom of the Business Owner/Operator Identification page. [HSC §25505(c)]

The Hazardous Materials Business Plan Certification Form is available from the Marin County CUPA or online at <http://www.unidocs.org>.

If all of the following conditions are met, facilities with an approved HMBP on file with Marin County CUPA are exempt from the requirements for annual inventory certification/submittal and triennial review/certification unless required by federal law or local ordinance. The site must: be an unstaffed remote facility located in an isolated sparsely populated area; be secured and inaccessible to the public; be marked with warning signs in accordance with California Fire Code requirements; and handle no more than: [HSC §25503.5(c)(6)]

- 500 gallons of combustible liquid (e.g., diesel);
- 1,200 gallons of flammable gas fuel (e.g., propane);
- 200 gallons of corrosive battery electrolytes (liquid- or gel-type);
- 500 standard cubic feet of compressed inert gases (e.g., nitrogen); or
- 500 gallons of lubricating and/or hydraulic fluids.

To whom do I submit the Hazardous Materials Business?

County of Marin
Waste Management Division-CUPA
65 Mitchell Blvd., Suite 200B
San Rafael, CA 94903

Telephone: (415) 499-6647
Fax: (415) 446-7373

Mailing Address:
County of Marin
Waste Management Division-CUPA
P.O. Box 4186
San Rafael, CA 94913-4186

County of Marin
Department of Public Works - Waste Management Division - CUPA
BUSINESS ACTIVITIES

Page 1 of ____

I. FACILITY IDENTIFICATION

FACILITY ID #	<div style="display: flex; justify-content: space-around;"> 21000 </div>	1.	EPA ID # (Hazardous Waste Only)	2.	
FACILITY NAME AND ADDRESS (Same as Business Name and Address)					3.

II. ACTIVITIES DECLARATION

**NOTE: If you check YES to any part of this list,
please submit the Business Owner/Operator Identification page (OES Form 2730).**

Does your facility...		If Yes, please complete these pages of the UPCF...
A. HAZARDOUS MATERIALS		
Have on site (for any purpose) hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70?	<input type="checkbox"/> YES <input type="checkbox"/> NO 4.	HAZARDOUS MATERIALS INVENTORY - CHEMICAL DESCRIPTION (OES 2731)
B. UNDERGROUND STORAGE TANKS (USTs)		
1. Own or operate underground storage tanks?	<input type="checkbox"/> YES <input type="checkbox"/> NO 5.	UST FACILITY (Formerly SWRCB Form A)
2. Intend to upgrade existing or install new USTs?	<input type="checkbox"/> YES <input type="checkbox"/> NO 6.	UST TANK (one page per tank) (Formerly Form B)
	<input type="checkbox"/> YES <input type="checkbox"/> NO 6.	UST FACILITY
	<input type="checkbox"/> YES <input type="checkbox"/> NO 6.	UST TANK (one per tank)
	<input type="checkbox"/> YES <input type="checkbox"/> NO 6.	UST INSTALLATION - CERTIFICATE OF COMPLIANCE (one page per tank) (Formerly Form C)
3. Need to report closing a UST?	<input type="checkbox"/> YES <input type="checkbox"/> NO 7.	UST TANK (closure portion - one page per tank)
C. ABOVE GROUND PETROLEUM STORAGE TANKS (ASTs)		
Own or operate ASTs above these thresholds: ---any tank capacity is greater than 660 gallons, or ---the total capacity for the facility is greater than 1,320 gallons?	<input type="checkbox"/> YES <input type="checkbox"/> NO 8.	NO FORM REQUIRED TO CUPAs
D. HAZARDOUS WASTE		
1. Generate hazardous waste?	<input type="checkbox"/> YES <input type="checkbox"/> NO 9.	EPA ID NUMBER - provide at the top of this page
2. Recycle more than 100 kg/month of excluded or exempted recyclable materials (per HSC §25143.2)?	<input type="checkbox"/> YES <input type="checkbox"/> NO 10.	RECYCLABLE MATERIALS REPORT (one per recycler)
3. Treat hazardous waste on site?	<input type="checkbox"/> YES <input type="checkbox"/> NO 11.	ONSITE HAZARDOUS WASTE TREATMENT - FACILITY (Formerly DTSC Forms 1772)
	<input type="checkbox"/> YES <input type="checkbox"/> NO 11.	ONSITE HAZARDOUS WASTE TREATMENT - UNIT (one page per unit) (Formerly DTSC Forms 1772 A, B, C, D and L)
4. Treatment subject to financial assurance requirements (for Permit by Rule and Conditional Authorization)?	<input type="checkbox"/> YES <input type="checkbox"/> NO 12.	CERTIFICATION OF FINANCIAL ASSURANCE (Formerly DTSC Form 1232)
5. Consolidate hazardous waste generated at a remote site?	<input type="checkbox"/> YES <input type="checkbox"/> NO 13.	REMOTE WASTE / CONSOLIDATION SITE ANNUAL NOTIFICATION (Formerly DTSC Form 1196)
6. Need to report the closure/removal of a tank that was classified as hazardous waste and cleaned onsite?	<input type="checkbox"/> YES <input type="checkbox"/> NO 14.	HAZARDOUS WASTE TANK CLOSURE CERTIFICATION (Formerly DTSC Form 1249)

E. LOCAL REQUIREMENTS

(You may also be required to provide additional information by your CUPA or local agency.)

15.

Business Activities Page Instructions

You must submit the Business Activities page with all submittals. [Note: Numbering of these instructions follows the Unified Program Consolidated Form (UPCF) data element numbers on the Business Activities page. These data element numbers are used for electronic submittal and are the same as the numbering used in 27 CCR, Appendix C, the Unified Program Data Dictionary.] Please number all pages of your submittal.

1. FACILITY ID NUMBER - Unless you are a new business, fill in your 6 digit permit number.
2. EPA ID NUMBER - If you generate, recycle, or treat hazardous waste, enter your facility's 12-character U.S. Environmental Protection Agency (U.S. EPA) or California Identification number. For facilities in California, the number usually starts with the letters "CA." If you do not have an ID number, contact the Department of Toxic Substances Control (DTSC) at 1-800-618-6942 to obtain one.
3. BUSINESS NAME - Enter the complete Facility Name.
4. HAZARDOUS MATERIALS ONSITE - Check the appropriate box to indicate whether you have any hazardous material on site in a quantity subject to Hazardous Materials Business Plan reporting requirements (please refer to the above Hazardous Materials Business Plan Information Sheet).
5. OWN OR OPERATE UNDERGROUND STORAGE TANK (UST) - Check the appropriate box to indicate whether you own or operate USTs containing hazardous substances as defined in Health and Safety Code (H&SC) §25316. If "YES", and you do not already have on file with your local agency a UST Facility page, UST Tank page for each tank, written UST Monitoring Plan, and UST Response Plan, then you must submit those documents. (There are no UPCF pages for the monitoring and response plans.)
6. UST INSTALLATION/UPGRADE - Check the appropriate box to indicate whether you have installed or upgraded USTs containing hazardous substances as defined in HSC §25316. If "YES," then you must submit to your local agency a UST Installation - Certificate of Compliance page for each tank in addition to the UST Facility and Tank pages.
7. UST CLOSURE - Check the appropriate box if you are closing a UST and complete the closure portion of the UST Tank page for each tank.
8. OWN/OPERATE ABOVEGROUND PETROLEUM STORAGE TANK (AST) - Check the appropriate box to indicate whether your facility stores petroleum aboveground in any tank greater than 660 gallons capacity or has aggregate aboveground petroleum storage greater than 1,320 gallons. (There is no UPCF page for ASTs.) The following are exempt from this requirement:
 - ° Pressure vessels or boilers subject to Division 5 of the Labor Code;
 - ° Tanks containing hazardous waste if a hazardous waste facility permit has been issued by DTSC;
 - ° Aboveground oil production tanks regulated by the Division of Oil and Gas;
 - ° Certain oil-filled electrical equipment, including, but not limited to, transformers, circuit breakers, and capacitors.
9. HAZARDOUS WASTE GENERATOR - Check the appropriate box to indicate whether your facility generates a waste that meets any of the hazardous waste criteria adopted pursuant to HSC §25141.
10. RECYCLE - Check the appropriate box to indicate whether your facility recycles more than 100 kilograms (approximately 220 pounds or 27 gallons) per month of recyclable material under a claim that the material is excluded or exempt per HSC §25143.2. If you check "YES," and you do not already have a current Recyclable Materials Report on file with your Certified Unified Program Agency (CUPA), then you must also submit that report to the CUPA. Check "NO" if you only send recyclable materials to an offsite recycler.
11. ONSITE HAZARDOUS WASTE TREATMENT - Check the appropriate box to indicate whether your facility engages in regulated onsite treatment of hazardous waste. If you check "YES," and you do not already have current Onsite Hazardous Waste Treatment Notification - Facility and Onsite Hazardous Waste Treatment Notification - Unit documents on file with your CUPA, then you must submit those forms to the CUPA.
12. FINANCIAL ASSURANCE - Check the appropriate box to indicate whether your facility has Permit by Rule (PBR) and/or Conditionally Authorized (CA) operations subject to financial assurance requirements for closure of an onsite treatment unit. If you check "YES," and you do not already have current "Certification of Financial Assurance" on file with your CUPA, then you must submit that form to the CUPA.
13. HAZARDOUS WASTE REMOTE CONSOLIDATION SITE - Check the appropriate box to indicate whether your facility consolidates hazardous waste generated at a remote site. By answering "YES," you are indicating that you are a hazardous waste generator that collects hazardous waste initially at remote sites and subsequently transports the hazardous waste to a consolidation site you also operate. If you check "YES," and you do not already have current "Remote Waste Consolidation Site Annual Notification" page on file with your CUPA, then you must submit that form to the CUPA.
14. HAZARDOUS WASTE TANK CLEANING - Check the appropriate box if any tank has been cleaned onsite per Title 22, Div. 4.5, Ch. 32, CCR. If you check "YES," then you must submit a Hazardous Waste Tank Closure Certification to your local agency.
15. LOCAL REQUIREMENTS - Check with your local agency before submitting this document to determine if any supplemental information is required.

County of Marin
Department of Public Works – Waste Management Division – CUPA
BUSINESS OWNER/OPERATOR IDENTIFICATION

I. IDENTIFICATION															Page. of			
FACILITY ID # (Agency Use Only)		2	1		0	0	0						1.	BEGINNING DATE	100.	ENDING DATE	101.	
FACILITY NAME (Same as Business Name)															3.	BUSINESS PHONE	102.	
FACILITY SITE ADDRESS																	103.	
CITY												104.	CA	ZIP CODE			105.	
DUN & BRADSTREET												106.	SIC CODE (4 digit #)			107.		
COUNTY																	108.	
FACILITY OPERATOR NAME															109.	FACILITY OPERATOR PHONE		110.
II. BUSINESS OWNER (If Different from Facility)																		
OWNER NAME															111.	OWNER PHONE		112.
OWNER MAILING ADDRESS																	113.	
CITY												114.	STATE		115.	ZIP CODE		116.
III. ENVIRONMENTAL CONTACT																		
CONTACT NAME															117.	CONTACT PHONE		118.
CONTACT MAILING ADDRESS																	119.	
CITY												120.	STATE		121.	ZIP CODE		122.
IV. EMERGENCY CONTACTS																		
-PRIMARY-								-SECONDARY-										
NAME								123.	NAME								128.	
TITLE								124.	TITLE								129.	
BUSINESS PHONE								125.	BUSINESS PHONE								130.	
24-HOUR PHONE*								126.	24-HOUR PHONE*								131.	
PAGER #								127.	PAGER #								132.	
ADDITIONAL LOCALLY COLLECTED INFORMATION:																	133.	
Property Owner: _____															Phone No.: _____			
Billing Address: _____																		
Certification: Based on my inquiry of those individuals responsible for obtaining the information, I certify under penalty of law that I have personally examined and am familiar with the information submitted and believe the information is true, accurate, and complete.																		
SIGNATURE OF OWNER/OPERATOR OR DESIGNATED REPRESENTATIVE												134.	NAME OF DOCUMENT PREPARER			135.		
NAME OF SIGNER (print)												136.	TITLE OF SIGNER			137.		

* See Instructions on next page.

Business Owner/Operator Identification Page Instructions

Except when using the Hazardous Materials Business Plan Certification Form, you must submit the Business Activities page, the Business Owner/Operator Identification page, and Hazardous Materials - Chemical Description pages with all hazardous materials inventory submittals. (Note: Numbering of these instructions follows the UPCF data element numbers on the Owner/Operator page.)

1. FACILITY ID NUMBER - Unless you are a new business, fill in your 6 digit permit number.
3. FACILITY NAME - Enter the complete Facility Name.
100. BEGINNING DATE - Enter the beginning year and date of the report.
101. ENDING DATE - Enter the ending year and date of the report.
102. BUSINESS PHONE - Enter the phone number, including area code and any extension.
103. BUSINESS SITE ADDRESS - Enter the street address where the facility is located, including building number, if applicable. Post office box numbers are not acceptable. This information must provide a means to locate the facility geographically.
104. CITY - Enter the city or unincorporated area in which the facility is located.
105. ZIP CODE - Enter the 5 or 9 digit zip code for the facility.
106. DUN & BRADSTREET - If the business has a D&B number, enter it here.
107. SIC CODE - Enter the 4 digit Standard Industrial Classification Code number for the facility's primary business activity.
108. COUNTY - Enter the name of the county in which the facility is located.
109. BUSINESS OPERATOR NAME - Enter the name of the facility operator.
110. BUSINESS OPERATOR PHONE - Enter the operator's phone number, including area code and any extension.
111. OWNER NAME - Enter the name of the facility owner, if different from the operator.
112. OWNER PHONE - Enter the owner's phone number, including area code and any extension.
113. OWNER MAILING ADDRESS - Enter the owner's street or P.O. Box mailing address, if different from the site address.
114. OWNER CITY - Enter the name of the city for the owner's mailing address.
115. OWNER STATE - Enter the 2 character state abbreviation for the owner's mailing address.
116. OWNER ZIP CODE - Enter the 5 or 9 digit zip code for the owner's mailing address.
117. ENVIRONMENTAL CONTACT NAME - Enter the name of the person, if different from the Business Owner or Operator, who will receive all environmental correspondence and will respond to enforcement activity.
118. CONTACT PHONE - Enter the environmental contact's phone number, including area code and any extension.
119. CONTACT MAILING ADDRESS - Enter the street or P.O. Box mailing address where all environmental contact correspondence should be sent, if different from the site address.
120. CITY - Enter the name of the city for the environmental contact's mailing address.
121. STATE - Enter the 2 character state abbreviation for the environmental contact's mailing address.
122. ZIP CODE - Enter the 5 or 9 digit zip code for the environmental contact's mailing address.
123. PRIMARY EMERGENCY CONTACT NAME - Enter the name of a representative (i.e. Emergency Coordinator) who can be contacted in case of an emergency involving hazardous material at the facility. This person shall have full facility access, site familiarity, and authority to make decisions for the business regarding incident mitigation.
124. TITLE - Enter the title of the primary Emergency Coordinator.
125. BUSINESS PHONE - Enter primary Emergency Coordinator's business phone number, including area code and any extension.
126. 24-HOUR PHONE - Enter a phone number that will be answered 24 hours a day. If not the primary Emergency Coordinator's home phone number, then the number of an answering service able to immediately contact the primary Emergency Coordinator must be provided. Please note that this is a public document, so any telephone number provided is available to the general public any time a review of your facility's records is conducted.
127. PAGER NUMBER - Enter the pager number for the primary Emergency Coordinator, if available.
128. SECONDARY EMERGENCY CONTACT NAME - Enter the name of a secondary Emergency Coordinator who can be contacted in the event that the primary Emergency Coordinator is not available. The contact shall have full facility access, site familiarity, and authority to make decisions for the business regarding incident mitigation.
129. TITLE - Enter the title of the secondary Emergency Coordinator.
130. BUSINESS PHONE - Enter secondary Emergency Coordinator's business phone number, including area code and any extension.
131. 24-HOUR PHONE - Enter a phone number for the secondary Emergency Coordinator. See instructions for item 123, above.
132. PAGER NUMBER - Enter the pager number for the secondary Emergency Coordinator, if available.
133. ADDITIONAL LOCALLY COLLECTED INFORMATION - Enter the name and phone number for the property owner. Enter the complete mailing address to which bills for permit fees should be sent, if different from items 119-122, above.
- SIGNATURE OF OWNER/OPERATOR OR DESIGNATED REPRESENTATIVE - The Business Owner/Operator, or officially designated representative of the Owner/Operator, shall sign in the space provided. This signature certifies that the signer is familiar with the information submitted, and that based on the signer's inquiry of those individuals responsible for obtaining the information, it is the signer's belief that the submitted information is true, accurate, and complete.
134. DATE - Enter the date that the document was signed.
135. NAME OF DOCUMENT PREPARER - Type or print the full name of the person who prepared the Business Plan information.
136. NAME OF SIGNER - Type or print the full name of the person signing this document.
137. TITLE OF SIGNER - Enter the title of the person signing this document.

County of Marin
Department of Public Works – Waste Management Division – CUPA
HAZARDOUS MATERIALS INVENTORY – CHEMICAL DESCRIPTION

(one page per material per building or area)

☐ ADD

☐ DELETE

☐ REVISE

200.

Page ____ of ____

I. FACILITY INFORMATION

FACILITY NAME AND ADDRESS(Same as Business Name and Address)

3.

CHEMICAL LOCATION(i.e., Warehouse, Office, Garage)

201.

CHEMICAL LOCATION CONFIDENTIAL

202.

EPCRA

☐ YES ☐ NO

203.

GRID #

204.

FACILITY ID #
(Agency Use Only)

2

1

0

0

0

0

0

0

0

0

0

0

0

0

0

1.

MAP #

II. CHEMICAL INFORMATION

CHEMICAL NAME

205.

TRADE SECRET

☐ Yes ☐ No

206.

If Subject to EPCRA, refer to instructions

COMMON NAME

207.

Extremely Hazardous Substance (EHS)

☐ Yes

☐ No

208.

CAS#

209.

*If EHS is "Yes," all amounts below must be in lbs.

FIRE CODE HAZARD CLASSES (Complete if required by local agency)

210.

HAZARDOUS MATERIAL
TYPE (Check one item only)

☐ a. PURE

☐ b. MIXTURE

☐ c. WASTE

211.

RADIOACTIVE ☐ Yes ☐ No

212.

CURIES

213.

PHYSICAL STATE
(Check one item only)

☐ a. SOLID

☐ b. LIQUID

☐ c. GAS

214.

LARGEST CONTAINER

215.

FED HAZARD CATEGORIES
(Check all that apply)

☐ a. FIRE

☐ b. REACTIVE

☐ c. PRESSURE RELEASE

☐ d. ACUTE HEALTH

☐ e. CHRONIC HEALTH

216.

AVERAGE DAILY AMOUNT

217.

MAXIMUM DAILY AMOUNT

218.

ANNUAL WASTE AMOUNT

219.

STATE WASTE CODE

220.

UNITS*
(Check one item only)

☐ a. GALLONS

☐ b. CUBIC FEET

☐ c. POUNDS

☐ d. TONS

* If EHS, amount must be in pounds.

221.

DAYS ON SITE

222.

STORAGE
CONTAINER

☐ a. ABOVEGROUND TANK

☐ e. PLASTIC/NONMETALLIC DRUM

☐ i. FIBER DRUM

☐ m. GLASS BOTTLE

☐ q. RAIL CAR

☐ b. UNDERGROUND TANK

☐ f. CAN

☐ j. BAG

☐ n. PLASTIC BOTTLE

☐ r. OTHER

☐ c. TANK INSIDE BUILDING

☐ g. CARBOY

☐ k. BOX

☐ o. TOTE BIN

☐ d. STEEL DRUM

☐ h. SILO

☐ l. CYLINDER

☐ p. TANK WAGON

223.

STORAGE PRESSURE

☐ a. AMBIENT

☐ b. ABOVE AMBIENT

☐ c. BELOW AMBIENT

224.

STORAGE TEMPERATURE

☐ a. AMBIENT

☐ b. ABOVE AMBIENT

☐ c. BELOW AMBIENT

☐ d. CRYOGENIC

225.

% WT

HAZARDOUS COMPONENT (For mixture or waste only)

EHS

CAS #

1.

226.

227.

☐ Yes ☐ No

228.

229.

2.

230.

231.

☐ Yes ☐ No

232.

233.

3.

234.

235.

☐ Yes ☐ No

236.

237.

4.

238.

239.

☐ Yes ☐ No

240.

241.

5.

242.

243.

☐ Yes ☐ No

244.

245.

If more hazardous components are present at greater than 1% by weight if non-carcinogenic, or 0.1% by weight if carcinogenic, attach additional sheets of paper capturing the required information.

ADDITIONAL LOCALLY COLLECTED INFORMATION

246.

DOT Hazard Class: _____

If EPCRA, Please Sign Here.

Hazardous Materials Inventory - Chemical Description Page (OES Form 2731) Instructions

You must complete a separate inventory page for each individual hazardous material or hazardous waste that you handle at your facility in an aggregate quantity subject to Hazardous Materials Business Plan reporting requirements (please refer to the above Hazardous Materials Business Plan Information Sheet). The completed inventory must reflect all hazardous materials at your facility, reported separately for each building or outside storage area, with separate pages for unique occurrences of physical state, storage temperature, or storage pressure. Where the aggregate quantities of some hazardous materials are below the Business Plan threshold reporting quantity, report the general hazard class of the materials (e.g. "Misc. Flammable Liquids"), rather than the Common Name, and the aggregate quantity of all hazardous materials having this hazard class which individually are below the threshold reporting quantity. (Note: Numbering of these instructions follows the UPCF data element numbers on the Inventory page.)

1. FACILITY ID NUMBER - Unless you are a new business, fill in your 6 digit permit number.
3. BUSINESS NAME - Enter the complete Facility Name.
200. ADD/DELETE/REVISE - Indicate whether the material is being added to the inventory, deleted from the inventory, or if the information previously submitted is being revised. (Note: You may leave this blank if you resubmit your entire inventory annually.)
201. CHEMICAL LOCATION - Enter the building or outside area where the hazardous material is handled. A chemical stored at the same pressure and temperature in multiple locations in one building can be reported on a single page.
202. CHEMICAL LOCATION CONFIDENTIAL - EPCRA - You must check "Yes" to keep chemical location information confidential. If you do not wish to keep chemical location information confidential check "No."
203. MAP NUMBER - Enter the page number of the Storage Map where the location of the hazardous material is shown.
204. GRID NUMBER - Enter the grid coordinates from your Storage Map that corresponds to the location of the hazardous material. If applicable, multiple grid coordinates can be listed.
205. CHEMICAL NAME - Enter the proper chemical name of the hazardous material. If the chemical is a mixture or waste, do not complete this field; complete the "Common Name" field instead.
206. TRADE SECRET - Check "Yes" if the information in this section is declared a trade secret, "No" if it is not. If "Yes," and the business is subject to EPCRA, disclosure of designated Trade Secret information is bound by 40 CFR and the business must submit a "Substantiation to Accompany Claims of Trade Secrecy" form to the United States Environmental Protection Agency.
207. COMMON NAME - Enter the common name or trade name of the hazardous material or mixture (e.g. gasoline).
208. EHS - Check "Yes" if the hazardous material is an Extremely Hazardous Substance (EHS) as defined in 40 CFR, Part 355, Appendix A. If the material is a mixture containing an EHS, leave this section blank and complete the section on hazardous components, below.
209. CAS # - Enter the Chemical Abstract Service (CAS) number for the hazardous material. For mixtures, enter the CAS number of the mixture if it has been assigned a number distinct from its components. If the mixture has no CAS number, leave this column blank and report the CAS numbers of the individual hazardous components in the appropriate section, below.
210. FIRE CODE HAZARD CLASSES - Provide this information if required by your local agency. A list of hazard classes and instructions on how to determine which class a material falls under are included in the appendices of Article 80 of the Uniform Fire Code. If a material has more than one applicable hazard class, include all. Contact your local agency for guidance.
211. HAZARDOUS MATERIAL TYPE - Check the one box that best describes the type of hazardous material: pure, mixture or waste. If the material is a waste, check only the "Waste" box.
212. RADIOACTIVE - Check "Yes" if the hazardous material is radioactive or "No" if it is not.
213. CURIES - If the hazardous material is radioactive, use this area to report the activity in curies.
214. PHYSICAL STATE - Check the one box that best describes the physical state of the hazardous material.
215. LARGEST CONTAINER - Enter the total capacity of the largest container in which the material is stored.
216. FEDERAL HAZARD CATEGORIES - Check all categories that describe the physical and health hazards associated with the hazardous material.

PHYSICAL HAZARDS	HEALTH HAZARDS
Fire: Flammable Liquids and Solids, Combustible Liquids, Pyrophorics, Oxidizers	Acute Health (Immediate): Toxics, Highly Toxics, Irritants, Sensitizers, Corrosives, other hazardous chemicals with an adverse effect with short-term exposure
Reactive: Unstable Reactives, Organic Peroxides, Water Reactives, Radioactives	
Pressure Release: Explosives, Compressed Gases, Blasting Agents	Chronic Health (Delayed): Carcinogens, other chemicals with an adverse effect with long-term exposure

217. AVERAGE DAILY AMOUNT - Calculate the average daily amount of the hazardous material or mixture in this building or outside area. If this is a material that is new to this location, the amount shall be the average daily amount you project to be on hand during the course of the year. This amount must be consistent with the units reported in box 221 and must not exceed that of maximum daily amount.
218. MAXIMUM DAILY AMOUNT - Enter the maximum amount of each hazardous material or mixture handled in this building or outside area at any one time over the course of the year. This amount must contain, at a minimum, last year's reported inventory with the reflection of additions, deletions, or revisions projected for the current year. This amount must be consistent with the units reported in box 221.
219. ANNUAL WASTE AMOUNT - If the material is a hazardous waste, enter the estimated annual amount handled.
220. STATE WASTE CODE - If the material is a hazardous waste, enter the appropriate California 3-digit hazardous waste code as listed on the back of the Uniform Hazardous Waste Manifest.
221. UNITS - Check the unit of measure most appropriate for the material. [Note: If the material is a federally defined Extremely Hazardous Substance (EHS) and is not a mixture, all amounts must be reported in pounds.]
222. DAYS ON SITE - List the total number of days during the year that the material is on site.
223. STORAGE CONTAINER - Check the boxes that describe the types of containers in which the material is stored.
224. STORAGE PRESSURE - Check the box that best describes the pressure at which the material is stored.
225. STORAGE TEMPERATURE - Check the box that best describes the temperature at which the material is stored.
226. HAZARDOUS COMPONENT (% BY WEIGHT) - If the material is a mixture, enter the percentage weight of the hazardous component(s). If a range of percentages is available, report the highest percentage in that range. (Repeat for components 2-5.)
227. HAZARDOUS COMPONENTS 1-5 NAME - If the material is a mixture, list the chemical name of each hazardous component in the mixture ranked by percent weight (refer to the MSDS or manufacturer). All hazardous components present at greater than 1% by weight if non-carcinogenic, or 0.1% by weight if carcinogenic, must be reported. If more than five hazardous components exceed these percentages, you may attach an additional sheet of paper to report the required information. When reporting wastes, mineral and chemical composition must be listed. (Repeat for components 2-5.)
228. HAZARDOUS COMPONENTS 1-5 EHS - Check "Yes" if the component of the mixture is considered an Extremely Hazardous Substance as defined in 40 CFR, Part 355, or "No" if it is not. (Repeat for components 2-5.)
229. HAZARDOUS COMPONENTS 1-5 CAS - List the Chemical Abstract Service (CAS) numbers as related to the hazardous components in the mixture. (Repeat for components 2-5.)
246. LOCALLY COLLECTED INFORMATION - Provide the primary U.S. Department of Transportation numerical Hazard Class if required by your local agency. Contact your local agency for guidance.

Emergency Response/Contingency Plan

(Hazardous Materials Business Plan Module)

Authority Cited: H&SC, Section 25504(b); Title 22, Div. 4.5, Ch. 12, Art. 3 CCR

Page ____ of ____

All facilities that handle hazardous materials in specified quantities must have a written emergency response plan. In addition, facilities that generate 1,000 kilograms or more of hazardous waste per month, or accumulate more than 6,000 kilograms of hazardous waste on-site at any one time, must prepare a contingency plan. Because the requirements are similar, they have been combined in a single document, provided below, for your convenience. This plan is a required module of the Hazardous Materials Business Plan (HMBP). If you already have a plan that meets these requirements, you should not complete the blank plan, below, but you must include a copy of your existing plan as part of your HMBP.

This site-specific Emergency Response/Contingency Plan is the facility's plan for dealing with emergencies and shall be implemented immediately whenever there is a fire, explosion, or release of hazardous materials that could threaten human health and/or the environment. At least one copy of the plan shall be maintained at the facility for use in the event of an emergency and for inspection by the local agency. Within Marin County, hospitals and police agencies have delegated receipt of these plans to the local agencies administering Hazardous Materials Business Plans, so additional copies need not be submitted. However, a copy of the plan and any revisions must be provided to any contractor, hospital, or agency with whom special (i.e. contractual) emergency services arrangements have been made (see section 3, below).

1. Evacuation Plan:

a. The following alarm signal(s) will be used to begin evacuation of the facility (check all that apply):

☐ Bells; ☐ Horns/Sirens; ☐ Verbal (i.e. shouting); ☐ Other (specify) _____

b. ☐ Evacuation map is prominently displayed throughout the facility.

Note: A properly completed HMBP Site Plan satisfies contingency plan map requirements. This drawing (or any other drawing that shows primary and alternate evacuation routes, emergency exits, and primary and alternate staging areas) must be prominently posted throughout the facility in locations where it will be visible to employees and visitors.

3. a. Emergency Contacts*:

Fire/Police/Ambulance	Phone No. 911
State Office of Emergency Services	Phone No. (800) 852-7550

3. Post-Incident Contacts*:

Fire Department Hazardous Materials Program	Phone No.: (____) _____
Marin County CUPA	Phone No. (415) 499-6647
California EPA Department of Toxic Substances Control	Phone No. (510) 540-3739
Cal-OSHA Division of Occupational Safety and Health	Phone No. (408) 452-7288
Bay Area Air Quality Management District	Phone No. (415) 771-6000
Regional Water Quality Control Board	Phone No. (510) 622-2300

* These telephone numbers are provided as a general aid to emergency notification. Be advised that additional agencies may be required to be notified.

3. Emergency Resources:

Poison Control Center	Phone No. (800) 876-4766
Nearest Hospital: Name: _____	Phone No.: (____) _____
Address: _____	City: _____

3. Arrangements With Emergency Responders:

If you have made special (i.e. contractual) arrangements with any police department, fire department, hospital, contractor, or State or local emergency response team to coordinate emergency services, describe those arrangements below:

Emergency Response/Contingency Plan (Hazardous Materials Business Plan Module)

4. Emergency Procedures:

Emergency Coordinator Responsibilities:

- a. Whenever there is an imminent or actual emergency situation such as a explosion, fire, or release, the emergency coordinator (*or his/her designee when the emergency coordinator is on call*) shall:
 - i. Identify the character, exact source, amount, and areal extent of any released hazardous materials.
 - ii. Assess possible hazards to human health or the environment that may result from the explosion, fire, or release. This assessment must consider both direct and indirect effects (*e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, the effects of any hazardous surface water run-off from water or chemical agents used to control fire, etc.*).
 - iii. Activate internal facility alarms or communications systems, where applicable, to notify all facility personnel.
 - iv. Notify appropriate local authorities (*i.e., call 911*).
 - v. Notify the State Office of Emergency Services at 1-800-852-7550.
 - vi. Monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment shut down in response to the incident.
 - vii. Take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous materials at the facility.
- b. Before facility operations are resumed in areas of the facility affected by the incident, the emergency coordinator shall:
 - i. Provide for proper storage and disposal of recovered waste, contaminated soil or surface water, or any other material that results from a explosion, fire, or release at the facility.
 - ii. Ensure that no material that is incompatible with the released material is transferred, stored, or disposed of in areas of the facility affected by the incident until cleanup procedures are completed.
 - iii. Ensure that all emergency equipment is cleaned, fit for its intended use, and available for use.
 - iv. Notify the California Environmental Protection Agency's Department of Toxic Substances Control, the local CUPA, and the local fire department's hazardous materials program that the facility is in compliance with requirements b-i and b-ii, above.

Responsibilities of Other Personnel:

On a separate page, list any emergency response functions not covered in the "Emergency Coordinator Responsibilities" section, above. Next to each function, list the job title or name of each person responsible for performing the function. Number the page(s) appropriately.

5. Post-Incident Reporting/Recording:

The time, date, and details of any hazardous materials incident that requires implementation of this plan shall be noted in the facility's operating record.

Within 15 days of any hazardous materials emergency incident or threatened hazardous materials emergency incident that triggers implementation of this plan, a written Emergency Incident Report, including, but not limited to a description of the incident and the facility's response to the incident, must be submitted to the California Environmental Protection Agency's Department of Toxic Substances Control, the local CUPA, and the local fire department's hazardous materials program. The report shall include:

- a. Name, address, and telephone number of the facility's owner/operator;
- b. Name, address, and telephone number of the facility;
- c. Date, time, and type of incident (*e.g., fire, explosion, etc.*);
- d. Name and quantity of material(s) involved;
- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable;
- g. Estimated quantity and disposition of recovered material that resulted from the incident;
- h. Cause(es) of the incident;
- i. Actions taken in response to the incident;
- j. Administrative or engineering controls designed to prevent such incidents in the future.

6. Earthquake Vulnerability: [19 CCR §2731(e)]

As an attachment to this plan, you must identify any areas of the facility and mechanical or other systems that require immediate inspection or isolation because of their vulnerability to earthquake-related ground motion.

7. Hazard Mitigation/Prevention/Abatement [19 CCR §2731(e)]

As an attachment to this plan, you must include procedures that provide for mitigation, prevention, or abatement of hazards to persons, property, or the environment. These procedures must be scaled appropriately for the size and nature of the business, the nature of the damage potential of the hazardous materials handled, and the proximity of the business to residential areas and other populations.

Emergency Response/Contingency Plan (Hazardous Materials Business Plan Module)**8. Emergency Equipment:**

22 CCR §66265.52(e) [as referenced by 22 CCR §66262.34(a)(4)] requires that emergency equipment at the facility be listed. Completion of the following Emergency Equipment Inventory Table meets this requirement.

EMERGENCY EQUIPMENT INVENTORY TABLE

1. Equipment Category	2. Equipment Type	3. Locations *	4. Description**
Personal Protective Equipment, Safety Equipment, and First Aid Equipment	<input type="checkbox"/> Cartridge Respirators		
	<input type="checkbox"/> Chemical Monitoring Equipment (<i>describe</i>)		
	<input type="checkbox"/> Chemical Protective Aprons/Coats		
	<input type="checkbox"/> Chemical Protective Boots		
	<input type="checkbox"/> Chemical Protective Gloves		
	<input type="checkbox"/> Chemical Protective Suits (<i>describe</i>)		
	<input type="checkbox"/> Face Shields		
	<input type="checkbox"/> First Aid Kits/Stations (<i>describe</i>)		
	<input type="checkbox"/> Hard Hats		
	<input type="checkbox"/> Plumbed Eye Wash Stations		
	<input type="checkbox"/> Portable Eye Wash Kits (<i>i.e. bottle type</i>)		
	<input type="checkbox"/> Respirator Cartridges (<i>describe</i>)		
	<input type="checkbox"/> Safety Glasses/Splash Goggles		
	<input type="checkbox"/> Safety Showers		
	<input type="checkbox"/> Self-Contained Breathing Apparatuses (SCBA)		
	<input type="checkbox"/> Other (<i>describe</i>)		
Fire Extinguishing Systems	<input type="checkbox"/> Automatic Fire Sprinkler Systems		
	<input type="checkbox"/> Fire Alarm Boxes/Stations		
	<input type="checkbox"/> Fire Extinguisher Systems (<i>describe</i>)		
	<input type="checkbox"/> Other (<i>describe</i>)		
Spill Control Equipment and Decontamination Equipment	<input type="checkbox"/> Absorbents (<i>describe</i>)		
	<input type="checkbox"/> Berms/Dikes (<i>describe</i>)		
	<input type="checkbox"/> Decontamination Equipment (<i>describe</i>)		
	<input type="checkbox"/> Emergency Tanks (<i>describe</i>)		
	<input type="checkbox"/> Exhaust Hoods		
	<input type="checkbox"/> Gas Cylinder Leak Repair Kits (<i>describe</i>)		
	<input type="checkbox"/> Neutralizers (<i>describe</i>)		
	<input type="checkbox"/> Overpack Drums		
	<input type="checkbox"/> Sumps (<i>describe</i>)		
Communications and Alarm Systems	<input type="checkbox"/> Other (<i>describe</i>)		
	<input type="checkbox"/> Chemical Alarms (<i>describe</i>)		
	<input type="checkbox"/> Intercoms/ PA Systems		
	<input type="checkbox"/> Portable Radios		
	<input type="checkbox"/> Telephones		
	<input type="checkbox"/> Underground Tank Leak Detection Monitors		
Additional Equipment (Use Additional Pages if Needed.)	<input type="checkbox"/> Other (<i>describe</i>)		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		

- Use the map and grid numbers from the Storage Map prepared earlier for your HMBP.
- ** Describe the equipment and its capabilities. If applicable, specify any testing/maintenance procedures/intervals. Attach additional pages, numbered appropriately, if needed.

Facility Site Plan/Storage Map

Facility Name and Address: _____

Date Map Drawn: ____/____/____.

Map Scale: _____

Page ____ of ____

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z
1																										
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Facility Site Plan and Storage Map Instructions

(Hazardous Materials Business Plan Module)

A Site Plan (public document) and Storage Map (confidential document) must be included with your HMBP. For relatively small facilities, these documents may be combined into one drawing. However, if combined, the combined Site Plan/Storage Map will become a public document. If you are concerned about displaying the storage locations of hazardous materials to the public, you must provide a separate facility Storage Map. Since these drawings are intended for use in emergency response situations, larger facilities (*generally those with complex and/or multiple buildings*) should provide an overall site plan and a separate storage map for each building/storage area. A blank Facility Site Plan/Storage Map sheet has been provided on the previous page. You may complete that page or attach any other drawing(s) that contain(s) the information required below:

1. Site Plan (public document): This drawing shall contain, at a minimum, the following information:

- a. An indication of North Direction;
- b. Approximate scale (*e.g. "1 inch = 10 feet"*);
- c. Date the map was drawn;
- d. All streets bordering the facility;
- e. Locations of all buildings and other structures;
- f. Parking lots and internal roads;
- g. Hazardous materials loading/unloading areas;
- h. Outside hazardous materials storage or use areas;
- i. Storm drain and sanitary sewer drain inlets;
- j. Wells for monitoring of underground tank systems;
- k. Primary and alternate evacuation routes, emergency exits, and primary and alternate staging areas.

2. Storage Map (confidential): The map(s) shall contain, at a minimum, the following information:

- a. General purpose of each section/area within each building (*e.g. "Office Area", "Manufacturing Area", etc.*);
- b. Location of each hazardous material/waste storage, dispensing, use, or handling area (*e.g. individual underground tanks, aboveground tanks, storage rooms, paint booths, etc.*). Each area shall be identifiable by a Grid Number, to be used in item 204 on the Hazardous Materials Inventory – Chemical Description pages of the Business Plan.
- c. For tanks, the capacity limit in gallons and common name of the hazardous material contained in each tank.
- d. Entrances to and exits from each building and hazardous material/waste room/area;
- e. Location of each utility emergency shut-off point (*i.e. gas, water, electric.*);
- f. Location of each monitoring system control panel (*e.g. underground tank monitoring, toxic gas monitoring, etc.*).

Record Keeping

(Hazardous Materials Business Plan Module)

All facilities that handle hazardous materials must maintain records associated with their management. A summary of your record keeping procedures is a required module of the Unidocs Hazardous Materials Business Plan (HMBP). A blank summary has been provided below for you to complete and submit if you do not already have such a document. **If you already have a brief written description of your hazardous materials record keeping systems that addresses all subjects covered below, you are not required to complete this page, but you must include a copy of your existing document as part of your HMBP.**

Check all boxes that apply. The following records are maintained at the facility. *[Note: Items marked with an asterisk (*) are required.]*:

<input type="checkbox"/>	Current employees' training records <i>(to be retained until closure of the facility) *</i>
<input type="checkbox"/>	Former employees' training records <i>(to be retained at least three years after termination of employment) *</i>
<input type="checkbox"/>	Training Program(s) <i>(i.e. written description of introductory and continuing training) *</i>
<input type="checkbox"/>	Current copy of this Emergency Response/Contingency Plan *
<input type="checkbox"/>	Record of recordable/reportable hazardous material/waste releases *
<input type="checkbox"/>	Record of hazardous material/waste storage area inspections
<input type="checkbox"/>	Record of hazardous waste tank daily inspections
<input type="checkbox"/>	Description and documentation of facility emergency response drills

Note: The above list of records does not necessarily identify every type of record required to be maintained by the facility.

Note: The following section applies where local agencies require facility owners/operators to perform and document routine facility self-inspections:

A copy of the Inspection Check Sheet(s) or Log(s) used in conjunction with required routine self-inspections of your facility must be submitted with your HMBP. *[Exception: Unidocs provides a Hazardous Materials/Waste Storage Area Inspection Form that you may use if you do not already have your own form. If you use the Unidocs form (available at www.unidocs.org), you do not need to attach a copy.]*

Check the appropriate box:

<input type="checkbox"/>	We will use the Unidocs "Hazardous Materials/Waste Storage Area Inspection Form" to document inspections.
<input type="checkbox"/>	We will use our own documents to record inspections. <i>(A blank copy of each document used must be attached to this HMBP.)</i>

Employee Training Plan (Hazardous Materials Business Plan Module)

Authority Cited: H&SC, Section 25504I; Title 22, Div. 4.5, Ch. 12, Art. 3 CCR

Page ____ of ____

All facilities that handle hazardous materials must have a written employee training plan. This plan is a required module of the Hazardous Materials Business Plan (HMBP). A blank plan has been provided below for you to complete and submit if you do not already have such a plan. If you already have a training plan, you are not required to complete the blank plan, below, but you must include a copy of your existing plan as part of your HMBP.

Check all boxes that apply. [Note: Items marked with an asterisk (*) are required.]:

3. Personnel are trained in the following procedures:

<input type="checkbox"/>	Internal alarm/notification *
<input type="checkbox"/>	Evacuation/re-entry procedures & assembly point locations*
<input type="checkbox"/>	Emergency incident reporting
<input type="checkbox"/>	External emergency response organization notification
<input type="checkbox"/>	Location(s) and contents of Emergency Response/Contingency Plan
<input type="checkbox"/>	Facility evacuation drills, that are conducted at least (specify) _____ (e.g. "Quarterly", etc.)

3. Chemical Handlers are additionally trained in the following:

<input type="checkbox"/>	Safe methods for handling and storage of hazardous materials *
<input type="checkbox"/>	Location(s) and proper use of fire and spill control equipment
<input type="checkbox"/>	Spill procedures/emergency procedures
<input type="checkbox"/>	Proper use of personal protective equipment *
<input type="checkbox"/>	Specific hazard(s) of each chemical to which they may be exposed, including routes of exposure (i.e. inhalation, ingestion, absorption) *
<input type="checkbox"/>	Hazardous Waste Handlers/Managers are trained in all aspects of hazardous waste management specific to their job duties (e.g. container accumulation time requirements, labeling requirements, storage area inspection requirements, manifesting requirements, etc.) *

3. Emergency Response Team Members are capable of and engaged in the following:

<input type="checkbox"/>	Personnel rescue procedures
<input type="checkbox"/>	Shutdown of operations
<input type="checkbox"/>	Liaison with responding agencies
<input type="checkbox"/>	Use, maintenance, and replacement of emergency response equipment
<input type="checkbox"/>	Refresher training, which is provided at least annually *
<input type="checkbox"/>	Emergency response drills, which are conducted at least (specify) _____ (e.g. "Quarterly", etc.)

SPILL CLEAN UP PROCEDURE

1. MAKE SURE THE FOLLOWING PROTECTIVE EQUIPMENT IS AVAILABLE FOR USE BEFORE ATTEMPTING TO CLEAN UP ANY SPILLS: SHOE COVERS, PROTECTIVE CLOTHING (TYVEK), GLOVES, AND GOGGLES.
2. USING A SPILL CLEAN UP KIT, PLACE ABSORBANT MATERIAL AROUND THE SPILL TO CREATE A CIRCULAR BARRIER AROUND THE SPILL. THIS WILL PREVENT THE SPILL FROM SPREADING
3. ESTIMATE THE VOLUME OF SPILL. IF YOU BELIEVE THE SPILL IS BEYOND YOUR CONTROL, AND YOU NEED ASSISTANCE, CALL 911 AND REQUEST THAT A HAZARDOUS MATERIALS UNIT BE DISPATCHED.
4. WHILE WAITING FOR THE HAZARDOUS MATERIALS UNIT TO ARRIVE, AND ONLY IF SAFE TO DO SO, BEGIN TO PLACE ABSORBING MATERIAL ONTO THE SPILL AS NECESSARY.
5. ONCE THE SPILL HAS BEEN CONTAINED, ALL SPILL-CONTAMINATED MATERIAL MUST BE PLACED INTO A CONTAINER AND APPROPRIATELY LABELED "HAZARDOUS WASTE".
6. CONTACT A LICENSED HAZARDOUS WASTE TRANSPORTER TO PICK UP YOUR HAZARDOUS WASTE.
7. ORDER REPLACEMENT PROTECTIVE EQUIPMENT AND CLEAN UP KITS.

Note that clean up procedures will vary depending on the type of material. Review your MSDS sheets to determine the appropriate procedure for the material that has been spilled

EARTHQUAKE VULNERABILITY

1. CCR TITLE 19, SECTION 2731 (e) IDENTIFICATION OF AREAS OF THE FACILITY AND MECHANICAL OR OTHER SYSTEMS THAT REQUIRE IMMEDIATE INSPECTION OR ISOLATION BECAUSE OF THEIR VULNERABILITY TO EARTHQUAKE RELATED GROUND MOTION.
2. **INSPECTION:** INSPECT ALL VULNERABLE HAZARDOUS WASTE/MATERIALS AREA, INCLUDING ANY OR ALL THAT APPLY TO COMPRESSED GASES, TANKS STORAGE CONTAINERS. ALL BRACES, CHAINS, AND SUPPORTING ANCHORS THAT SECURE HAZARDOUS WASTE/MATERIALS WILL BE INSPECTED FOR INTEGRITY BREACH.
3. **ISOLATION:** COMPRESSED GASES THAT ARE INCOMPATIBLE WILL BE SEGREGATED TO PREVENT HAZARD OF COMINGLING AND OTHER CHEMICALS OF A HAZARD CATEGORY OF INCOMPATIBILITY WILL BE SEGREGATED AS NECESSARY.

ADDITIONAL TRAINING TOPICS

- 1) **PREVENTION:** Describe procedures that will be used to prevent the accidental release of hazardous material. These should be specific for the business operation. Examples listed below.
 - a) train employees in the proper methods of handling hazardous materials
 - b) look at transfer operations and improve them as necessary to reduce the likelihood of a spill
 - c) berm or use secondary containment in areas where hazardous materials can be easily discharged
 - d) visually inspect containers at least once per week to check for leaks and container degradation and store containers in a manner that this inspection can be easily performed
 - e) make sure that incompatible materials are stored separately and that there is adequate separation between these materials in the event of a discharge
 - f) repair, modify, and or replace faulty equipment
 - g) installation of alarm, detection, monitoring or automatic control devices

- 2) **MITIGATION:** Describe procedures that will be used to reduce the hazard or damage caused to persons, property, and the environment. Examples listed below.
 - a) restrict access to the area of the release
 - b) stay up wind of the release
 - c) turn off the building ventilation system
 - d) dike, divert or absorb liquids
 - e) cover or suppress emissions, as appropriate
 - f) minimize and control the immediate spread of the material
 - g) shut off electrical or chemical sources contributing to the emergency
 - h) predict the direction of the spill
 - i) use absorbents, as appropriate, to absorb the material
 - j) remove contaminated clothing
 - k) wash away any material that contacts the body with copious amounts of soap and water

- 3) **ABATEMENT:** Describe procedures that will be used to stop the hazard. Examples listed below.
 - a) fight small fires only
 - b) remove sources of ignition
 - c) close valves or container
 - d) roll leaking containers so that the leaking side is up
 - e) plug or seal leaks

Facility Name:

Address:

Street

Trainer:

Date:

Note: Items marked with an asterisk(*) are required.

Additional Topics Covers:

RECORD

[illegible]

CUPA FEES 2007

ORDINANCE NO. 3357

ORDINANCE OF THE MARIN COUNTY BOARD OF SUPERVISORS AMENDING SECTION 7.80.060 OF THE MARIN COUNTY CODE RELATED TO CERTIFIED UNIFIED PROGRAM AGENCY ("CUPA") FEES

THE BOARD OF SUPERVISORS OF THE COUNTY OF MARIN DOES HEREBY ORDAIN AS FOLLOWS:

SECTION I. Section 7.80.060 of the Marin County Code is hereby amended to read:

Section 7.80.060

Fee Schedule.

Pursuant to California Health and Safety Code, Division 20, Chapter 6.11, Section 25404.5(a), each CUPA shall institute a single fee system for all CUPA programs. Any existing fees for programs now under CUPA are to be replaced by the single fee system. These fees are to be set to a level sufficient to pay necessary and reasonable cost incurred by the CUPA in administering the CUPA programs. The changes in the fee schedule shall become in effect upon the effective date of this ordinance. Future amendments may be added to cover the costs of implementing the various CUPA programs. No refund or rebate of a permit application shall be allowed by reason of the fact that the permit is denied or the permittee discontinues the activity or use of a facility prior to the expiration of the term of that permit.

The following fees and charges are enacted:

Underground Storage Tank Fees

	<u>Amount</u>
Annual permit to operate (store): Per tank	\$750.00
Plan check/installation inspection: Per tank (up to 5 hours of staff time*)	500.00
Modification of tank system – No plan check: Per tank (up to 3 hours of staff time*)	300.00
Modification of tank system – Plan check: Per tank (up to 5 hours of staff time*)	500.00
Removal of tank(s): Per tank (up to 5 hours of staff time*)	500.00
Transfer of permit: All tanks	200.00
Consultation/facility oversight:	100.00/hour
In-place closure: Per tank (up to 5 hours of staff time *)	500.00
Temporary closure:	100.00

*Additional hours billed at \$100.00/hours.

Hazardous Material Business Plan Fees

Hazardous Materials in Tanks (Both Aboveground and Underground)

Fee Group	Volume	Fee
Total Volume of Hazardous Material in Tanks (Both Aboveground and Underground)		
T1	Aggregates of up to and including 500 gallons	\$225.00
T2	Aggregates of 501 - 1,500 gallons.	250.00
T3	Aggregates of 1,501 – 12,000 gallons.	275.00
T4	Aggregates of 12,001 – 40,000 gallons.	300.00
T5	Aggregates of > 40,000 gallons.	325.00

Volume of Hazardous Materials NOT Contained in Tanks

R1	Aggregates of 0 – 55 gallons (Applicable only if you use hazardous materials in a tank)	\$50.00
R2	Aggregates of 56 – 165 gallons, 500 – 1,000 cubic feet, 100 – 999 pounds	375.00
R3	Aggregates of 166 – 550 gallons, 1,001 – 10,000 cubic feet, 1,000 – 5,000 pounds	400.00
R4	Aggregates of 551 – 1,100 gallons, >10,000 cubic feet, 5,001 – 10,000 pounds	425.00
R5	Aggregates of 1,101 – 2,750 gallons, 10,001 – 50,000 pounds	450.00
F	Farms	150.00
	Consultation/facility oversight	100.00/hour

Generator and Hazardous Waste Treatment Fees

Hazardous waste generator program fee:	\$300.00
Hazardous waste onsite treatment/tiered permitting	500.00
Farm hazardous waste generator	125.00
Consultation/facility oversight	100.00/hour

SECTION II.

A State of California surcharge as required by the Health and Safety Code and California Code of Regulations shall be added to each fee.

SECTION III. Except as modified above, all of the language shall remain the same.

SECTION IV. Publication

This Ordinance shall be and is hereby declared to be in full force and effect thirty (30) days from and after date of its passage and shall be published once before the expiration of fifteen (15) days after passage, with the names of the Supervisors voting for and against the same in the *Marin Independent Journal*, a newspaper of general circulation published in the County of Marin.

PASSED AND ADOPTED at a regular meeting of the Board of Supervisors of the County of Marin held on this 5th day of November, 2002 by the following vote:

AYES: SUPERVISORS John B. Kress, Harold C. Brown, Jr., Steve Kinsey,
Annette Rose, Cynthia L. Murray

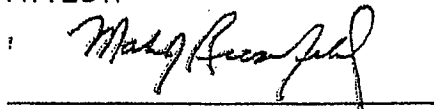
NOES: NONE

ABSENT: NONE



PRESIDENT, BOARD OF SUPERVISORS

ATTEST:



CLERK

**STANDARD OPERATING PROCEDURES
MARIN COUNTY, DEPARTMENT OF PUBLIC WORKS, OFFICE OF WASTE
MANAGEMENT/CUPA**

**CALIFORNIA ACCIDENTAL RELEASE PROGRAM (CalARP)
RISK MANAGEMENT PROGRAM (RMP)**

1. Purpose

As a Certified Unified Program Agency (CUPA), the Marin County Department of Public Works, Division of Waste Management has the responsibility to implement the state CalARP laws and regulations. The purpose of the Cal ARP program is to prevent the accidental release of specified chemicals by the preparation of and implementation of a Risk Management Program (RMP). The purpose of this SOP is to establish a policy to implement the CalARP Program in a consistent and uniform manner.

The Federal Government under the Environmental Protection Agency established the Chemical Accident Prevention and Preparedness Risk Management Program, which the state adopted with some additions to create the CalARP program. Under the Clean Air Act (CAA), EPA will serve as the implementing agency until a state or local agency seeks and is granted delegation. The state program may substitute for the federal program. The CHSC (California Health and Safety Code) states that it is the intent of the legislature that the state seek and receive delegation to administer the federal program. It doesn't appear that the State has been delegated to run the federal program as of June 2006. A question and answer document with a June 2006 says that a business may have to send copied of the RMP to the federal government.

2. Regulatory Authority

California Health and Safety Code (CHSC), Division 20, Chapter 6.95, Article 3, Section 25531 et seq.

California Code of Regulations (CCR) Title 19, Division 2, Chapter 4.5 Section 2735 et. seq.

Reference 40 CFR, Code of Federal Regulations, Part 68, Section 112 (r), Clean Air Act

3. Applicability

CalARP Program requirements shall apply to the owner or operator of a stationary source with more than a threshold quantity of a regulated substance in a process as defined by Section 2735.3, Title 19, CCR. The listed substances can be found on three separate tables in Section 2770.5. The covered processes are divided into three programs which are essentially low, medium, high hazard categories.

4. Program Levels

The CalARP Program has defined and established three program levels with differing levels of requirements dependent on the type of material, the complexity, accident history, and potential impact of releases of regulated substances. The eligibility criteria for the three programs are as follows:

- A. Program One: A process shall fall under Program One requirements as provided in Section 2735.5(d) if it meets *all* of the following requirements:
 - 1. For the five years prior to the submission of a RMP, the process has not had an accidental release of a regulated substance; and,
 - 2. The distance to a toxic or flammable endpoint for a worst-case release assessment conducted under Section 2750.3 is less than the distance to *any* public receptor; and,
 - 3. Emergency response procedures have been coordinated between the stationary source (facility) and local emergency planning and response organizations.
- B. Program Two: A process shall fall under Program Two requirements if it does **not** meet the eligibility requirements of Program 1 or 3.
- C. Program Three: A process shall fall under Program Three requirements if it does **not** meet the criteria in part A of this section and if any of the following requirements apply:
 - 1. The process is in Standard Industrial Classification (SIC) Code 2611, 2812, 2819, 2821, 2865, 2869, 2873, 2879 or 2911.
 - 2. The process is subject to the Federal or State OSHA Process Safety Management (PSM) standards of Section 1910.119 of Title 29 CFR or Section 5189 of Title 8, CCR.
 - 3. The CUPA determines that the accident risk posed by the regulated substance in a process above the threshold quantity listed in Table 3 of Section 2770.5, because of the nature and quantity of the substance involved, requires the additional safety afforded by the Program 3 requirements pursuant to Section 25534(b) of CH&SC.

IN ADDITION, if a process exceeds the state thresholds but does not exceed the federal thresholds, the CUPA can, under certain conditions, change the Program Level or even exempt the process entirely. These processes will be evaluated on a case by case basis.

5. RMP Components

Program 1 Requirements

The state regulations found in the California Code of Regulations, Title 19, Division 2, Chapter 4.5 contain the detailed requirements applicable to each of the below listed items.

- Risk Management Plan - the document submitted for public review
 - Executive Summary
 - Off-site Consequence Analysis
 - Five year Accident History
 - Prevention Program
 - Emergency Response Program
- Hazard Assessment
 - Off-site Consequence Analysis - worst case scenario only
 - Five Year Accident History
- Ensure that response actions have been coordinated with local emergency planning and response agencies
- Make a specific certification in the Risk Management Plan regarding the off-site consequence analysis and emergency response.

Program 2 Requirements

The State regulations found in the California Code of Regulations, Title 19, Division 2, Chapter 4.5 contain the detailed requirements applicable to each of the below listed items.

- Hazard Assessment
 - Off-site Consequence Analysis
 - Five Year Accident History
- Prevention Program
 - Safety Information
 - Hazard Review
 - Operating Procedures
 - Training
 - Maintenance
 - Compliance Audits
 - Incident Investigation
- Emergency Response Program
- Risk Management Plan - the document submitted for public review
 - Executive Summary
 - Off-site Consequence Analysis
 - Five year Accident History
 - Prevention Program
 - Emergency Response Program

Program 3 Requirements

The State regulations found in the California Code of Regulations, Title 19, Division 2, Chapter 4.5 contain the detailed requirements applicable to each of the below listed items.

- Hazard Assessment
 - Off-site Consequence Analysis
 - Five Year Accident History
- Prevention Program
 - Process Safety Information
 - Process Hazard Analysis
 - Operating Procedures
 - Training
 - Mechanical Integrity
 - Management of Change
 - Pre-Start Up Review
 - Compliance Audits
 - Incident Investigation
 - Employee Participation
 - Hot Work Permit
- Contractors
- Emergency Response Program
- Risk Management Plan - the document submitted for public review
 - Executive Summary
 - Off-site Consequence Analysis
 - Five year Accident History
 - Prevention Program
- Emergency Response Program

6. RMP Review Process

Any stationary source suspected of having regulated substances over threshold quantities shall complete a CalARP Registration Form. If an RMP is then requested pursuant to the CalARP Program, the facility shall submit the RMP document within 1 year or up to 36 months depending upon any appeals made for an extension on behalf of the facility. Following receipt of the RMP by the CUPA, the following procedures are to be followed:

- A. Initial public notice. Once the CUPA receives an RMP, they are to publish a notice in a newspaper (no time frame, but same time frame as original date of RMP submittal requirement-1year) of general circulation stating that the RMP has been submitted and the review process by government and the public has been initiated.
- B The CUPA is to review the RMP (no time frame, but within same time frame as RMP original submittal date-1year) to determine if all the elements, pursuant to sections 2745.3 through 2745.9, are contained in the document. Any deficiencies noted are to be provided in a written notice to the owner/operator. See attachment A.

- D The owner/operator is to correct any deficiencies found within 60 calendar days from the receipt of notice of the deficiencies. A one time extension of 30 days may be granted upon written request. Failure to correct the deficiencies within the timeframe shall subject the owner or operator to the penalties specified in Sections 25540 & 25441 CH&SC. If no deficiencies are identified, the CUPA shall deem the RMP complete and submit the RMP for formal public review.
- E If no deficiencies are found the CUPA is to accept the document as complete and submit the document for the formal review process.
- F. Formal Public Review. Within 15 calendar days of deeming the document complete, the CUPA is to make the RMP available for public review and comment by publishing a notice in a local newspaper of general circulation. The notice shall describe the RMP, a location where it can be reviewed and state that the public has 45 days to make comments. The notice shall include such information as a contact phone number, and the dates and times the document is available for review. See Attachment B.
- G. Evaluation review-This time frame begins at end of deficiency correction (see D above) and is 2 years. At the end of the formal public review, the CUPA shall conduct a evaluation using the *RMP Formal Evaluation Checklist* (see Appendix C). The CUPA is to take any public comments into consideration during this review. The CUPA shall consider standard application of engineering and scientific principles, site specific characteristics, technical accuracy, severity of offsite consequences and other information in possession of or reviewed by the CUPA. It may include inspections and onsite document review. For RMP's in Programs One or Two, the evaluation shall be completed in 36 months (24 months for program three). A time for correction of deficiencies is not included in state regulations. Try to work out an amenable correction time with the facility for time making the corrections. Upon correction of any deficiencies, the CUPA shall issue a *Notice of Completeness*..

7. Compliance Audits

The owner or operator shall certify that they have evaluated compliance with the provisions of this article at least every three years to verify the procedures and practices are being followed. Audits shall follow all the criteria in Section 2760.8.

8. CUPA Audits

In addition to inspections, the CUPA shall periodically audit RMP's submitted to review adequacy of the RMP, require revisions if necessary and ensure compliance with Article 3 CCR Title 19 Division 4 Chapter 4.5. The requirements of the audit are found in Section 2775.2

Since there is only one RMP facility in our CUPA and no more are anticipated due to the low industry volume and their acceptance in Marin, the frequency of the audits will be established once the first audit has been completed. The best use of time may be to conduct an audit along with the routine RMP inspection.

The CUPA may issue a preliminary determination of necessary revisions to insure that it meets the requirements of Article 3. The preliminary determination shall include an explanation for the basis the revisions and a time table for their implementation.

The owner/operator shall respond in writing to the preliminary determination within 90 days of its issuance. The CUPA can reduce this time if there is a determination made that a response is needed in less time to protect public health and the environment.

After providing an opportunity for response, the CUPA may issue a written final determination of necessary revisions which includes a time table.

9. CUPA Inspections

The CUPA shall inspect every stationary source required to register pursuant to the Cal ARP regulations at least once every three years.

10. Dispute Resolution-Title 19, Section 2780.1

Disputes arising between the owner and operator of a stationary source and an AA under this chapter shall first be decided by the AA pursuant to a dispute resolution process. Each AA shall establish procedures necessary to implement this dispute resolution process. Please refer to Title 19, Section 2780.1 (a)(1)-(5), (b)(1)-(3), (c), (d), (e). for specific procedures.

11. Attachments

The following documents shall be used for the RMP process.

- A. RMP Initial Completeness Review
- B. RMP Formal Evaluation Checklist
- C. RMP Audit and Inspection Checklist

Reviewed 8/15/2006 BAZ, 9/16/06 GM